

Federal Defenders OF NEW YORK, INC.

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May 25, 2011

The Honorable Edward R. Korman
Senior United States District Judge
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

*Charge et
was prepared
to give
re. questionnaires
(cf 1, 2, 11/7/11)*

Re: United States v. Joseph Yannai, CR 10-594 (ERK)

Your Honor:

Should the Court allow government's trial exhibits one and two into evidence, the defendant requests the following limiting instruction be given to the jury.

The government has introduced evidence that Mr. Yannai sent and received questionnaires from women who were au pairs or looking to become au pairs. The defendant is not charged with inducing or attempting to induce any of those women to come to his home. The government exhibits were introduced to show some of the work the witnesses may have performed in the home. You may consider this evidence on that issue. You may not consider it as proof the defendant has a criminal personality or a bad character.

Thank you for your attention to this matter.

Respectfully submitted,

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cc: Clerk of the Court (by ECF)
Daniel Spector, A.U.S.A.
Hilary Jager, A.U.S.A.
Audrey Stone, Special Assistant United States Attorney
Joseph Yannai

*You may not
consider it
as proof of
a bad character.
You may only
consider it
as proof of
the work the
witnesses
performed
in the home.
It is
relevant
to the case
charge.
Cautious and all
del. 10/1/11*